



April 4, 2012

E-mailed 4/3/2012 (tk)

Federal Coordinator  
Division of WIA Adult Services and Workforce System  
Employment and Training Administration  
U.S. Department of Labor (USDOL)  
200 Constitution Avenue, NW, Room S-4209  
Washington, D.C. 20210

Attention: Heather Fleck

In accordance with Training Employment Guidance Letter (TEGL) 21-11, issued on March 27, 2012, the Workforce Development Agency (WDA), State of Michigan ("the State"), is requesting a temporary extension of our current Workforce Investment Act (WIA) and Wagner-Peyser strategic plan, including the continuation of existing waivers and performance levels into Program Year 2012.

The WDA will use the additional time in preparing the Plan to solicit input from workforce, education and economic development partners, as well as new WDA leadership. Partner input will help shape State strategies and initiatives as we strive for an employer-driven economy. The WDA will submit the new five-year plan by September 14, 2012.

**Continuation of Existing Waivers:**

Continuation of the following WIA waivers will continue to assist the State in developing its workforce investment system.

1. Waiver of WIA Section 133(b)(4): Waiver to increase the allowable transfer amount between Adult and Dislocated Worker funding streams allocated to local areas. The waiver allows an increase of up to 50 percent in the amount that local areas can transfer between Adult and Dislocated Worker funding streams.
2. WIA Section 101(8)(C): Waiver of the required 50 percent employer contribution for customized training. The waiver permits the use of a sliding scale for the employer contribution, based on the size of the business.
3. WIA Section 101(31)(B): Waiver to increase the employer reimbursement for on-the-job training (OJT). The waiver increases the reimbursement for OJT through a sliding scale, based on the size of the business. OJT training is restricted to skill attainment activities.
4. WIA Section 134(a): Waiver to permit local areas to use a portion of local funds for incumbent worker training. The waiver permits local areas to utilize up to 20 percent of local dislocated worker funds for incumbent worker training as part of a lay-off aversion strategy.



Workforce Development Agency, State of Michigan  
Victor Office Center | 201 North Washington Square, 5th Floor | Lansing, Michigan 48913  
michigan.gov/bwt | 517.335.5858 | TTY 888.605.6722

*The WDASOM is an equal opportunity employer/program. Auxiliary aids, services and other reasonable accommodations are available upon request to individuals with disabilities.*

5. WIA Section 134(a)(1)(A): Waiver to permit a portion of the funds reserved for rapid response activities to be used for incumbent worker training. The waiver allows the State to utilize up to 20 percent of rapid response funds for incumbent worker training as part of a lay-off aversion strategy.
6. WIA Section 20 CFR 664.510: Waiver on the use of Individual Training Accounts (ITAs) for older and out-of-school youth program participants. Funds utilized for older and out of school youth ITAs are tracked and reflected in the individual service strategies. The ten youth program elements will continue to be available as described in WIA Section 129(c)(2).
7. WIA Regulations 20 CFR 666.100: Waiver to exempt the State from including credential attainment outcomes for participants enrolled in OJT in the credential performance measure calculations. The waiver applies for all participants enrolled in OJT, regardless of funding source. The State will continue to report outcomes in the WIASRD for participants enrolled in OJT.
8. WIA Regulations 20 CFR 663.530: Waiver of the provision that prescribes a time limit on the period of initial eligibility for training providers. The waiver extends the period of "Initial Eligibility of Training Providers," thereby postponing the "Subsequent Eligibility of Training Providers." The extension maintains the broadest range of eligible providers to enable individuals to make informed choices relating to their training goals.
9. WIA Section 134(a)(2)(B)(ii): Waiver of the requirement to conduct evaluations of WIA activities for adult, dislocated worker, and youth. The WDA recently submitted this waiver request on March 20, 2012, in accordance with TEGL 09-11, published October 26, 2011. The request is pending U.S. Department of Labor (USDOL) approval.

Your consideration of our temporary extension and continuation of waivers and performance levels is appreciated. Please contact Mr. Gary Clark, Director of the Office of Talent Development Services at (517) 241-2729 with questions.

Sincerely,

**SIGNED**

Michael Pohnl, Interim Director  
Workforce Development Agency  
WIA Title I Signatory Official

MP:JC:tk

cc: Byron Zuidema, Regional Administrator, ETA Chicago Regional Office, USDOL  
Adele Gagliardi, Regional Director, ETA Chicago Regional Office, USDOL  
Malcom Jackson, Project Officer for Michigan, USDOL  
Janet Howard, Deputy Director, Strategic Planning, Operations, Policy and Finance  
Gary Clark, Director, Office of Talent Development Services  
Stephanie Beckhorn, Manager, WIA Section  
Brian Marcotte, Manager, Welfare Reform/Wagner-Peyser Section  
Joseph Billig, Manager, Management Information Systems.  
Janice Cooper, WIA Specialist, WIA Section  
Sara Spielman, Analyst, Welfare Reform/Wagner-Peyser Section